

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE'S
OPPOSITION TO TQ DELTA'S MOTION FOR LEAVE TO SERVE THE FIRST
SUPPLEMENTAL EXPERT REPORT OF JONATHAN D. PUTNAM (DKT. 349)**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.
2. Attached hereto as **Exhibit A** is a true and correct copy of an email between myself and counsel for TQ Delta, dated December 9, 2022.
3. Attached hereto as **Exhibit B** are true and correct copies of spreadsheets bearing Bates numbers COMMSCOPE16810, COMMSCOPE16813, COMMSCOPE16814, and COMMSCOPE16816. A screenshot of COMMSCOPE16814 opened natively is also excerpted in CommScope's opposition.

4. Attached hereto as **Exhibit C** is a true and correct copy of an email dated April 22, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of the transcript for the deposition of Mr. Daniel Hagarty.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts of Plaintiff TQ Delta's Second Supplemental Objections and Responses to CommScope's First Set of Interrogatories (Nos. 1-35).

7. Attached hereto as **Exhibit F** is a true and correct copy of the cover document for Plaintiff's Disclosure of Asserted Claims and Infringement Contentions.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong